

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Tyrone W. Klump, Sr. Ruthann F. Klump Debtor(s).	: : : : : :	Case No.: 17-10030 Chapter 13 Judge Richard E. Fehling *****
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OBJECTION TO DEBTOR'S CHAPTER 13 PLAN

Now comes Wells Fargo Bank, N.A. ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and files this Objection to Debtor's Chapter 13 Plan, averring as follows:

1. Creditor is a creditor herein secured by a first mortgage lien upon the Debtor's real estate located at 6571 Sullivan Trail, Pen Argyl, PA 18072, represented by Creditor's proof of claim number 5.
2. Debtor's Chapter 13 Plan does not list Creditor's subject mortgage loan as a secured claim, and makes no provision for the maintenance of post-petition payments.
3. Upon information and belief, Creditor asserts that Debtor still holds an interest in the property. As such, Creditor requests that the plan be amended to provide for Creditor's claim or to surrender said interest.

WHEREFORE, Creditor respectfully requests the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)
Kimberly A. Bonner (89705)
Holly N. Wolf (322153)
Manley Deas Kochalski LLC
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Attorneys for Creditor

The case attorney for this file is Karina
Velter.

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In re: :
: **Case No.: 17-10030**
Tyrone W. Klump, Sr. : **Chapter 13**
Ruthann F. Klump : **Judge Richard E. Fehling**
: *********
Debtor(s).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection to Debtor's

Chapter 13 Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

Frederick L. Reigle, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave.,
Reading, PA 19606

Jason M Rapa, Attorney for Tyrone W. Klump, Sr. and Ruthann F. Klump, Rapa Law Office,
PC, 141 South 1st Street, Lehighton, PA 18235, jrapa@rapalegal.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on April 3,
2017:

Tyrone W. Klump, Sr. and Ruthann F. Klump, 6571 Sullivan Trail, Pen Argyl, PA 18072

DATE: 4/3/17

/s/ Karina Velter

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